

EXHIBIT 2

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
HILLARY LAWSON, KRISTINA HALLMAN,
STEPHANIE CALDWELL, MORA HATHAWAY,
MACEY SPEIGHT, ROSMARIE PETERSON,
AND LAUREN FULLER,

Plaintiffs,

vs.

Case No.
1:17-CV-06404

HOWARD RUBIN, JENNIFER POWERS
and the DOE COMPANY,

Defendants.

-----x
CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Videotaped Deposition of [REDACTED]
proceeding pseudonymously as

HILLARY LAWSON

New York, New York

Tuesday, September 25, 2018 - 10:31 a.m.

Reported by:

Jennifer Ocampo-Guzman, CRR, CLR

Job no: 22860

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

<p>Page 30</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 32</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p>Page 31</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 33</p> <p>1 [REDACTED]/Lawson</p> <p>2 There's many different form.</p> <p>3 Q. What about a session that's not a</p> <p>4 model workshop session, how are you paid</p> <p>5 there?</p> <p>6 A. Cash, typically.</p> <p>7 Q. And is that an hourly fee?</p> <p>8 A. Yes.</p> <p>9 Q. Did you typically use social media</p> <p>10 as a marketing tool?</p> <p>11 A. One of them.</p> <p>12 Q. When you say "One of them," you</p> <p>13 mean one form of social media you used as a</p> <p>14 marketing tool?</p> <p>15 A. There's many forms.</p> <p>16 Q. And did you use many forms of</p> <p>17 social media to market yourself?</p> <p>18 A. Correct, yes. My portfolio is</p> <p>19 posted on --</p> <p>20 Q. I'm sorry, on?</p> <p>21 A. My portfolio is posted.</p> <p>22 Q. Is posted on what?</p> <p>23 A. Social media.</p> <p>24 Q. What platforms is it posted on?</p> <p>25 A. [REDACTED]</p>

9 (Pages 30 to 33)

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 34		Page 36	
1	██████████/Lawson	1	██████████/Lawson
2	Q. Yes.	2	
3	A. Instagram is one that models use.	3	
4	Q. I'm sorry, Instagram is one?	4	
5	A. Instagram is one that models use.	5	
6	Q. Do you use it?	6	
7	A. I have.	7	
8	Facebook.	8	
9	Q. Any others?	9	
10	A. I don't remember. That's what I	10	
11	remember.	11	
12	Q. That's what you remember. Okay.	12	
13	How did you first learn of Mr.	13	
14	Rubin?	14	
15	A. I was contacted on Instagram.	15	
16	Q. I'm sorry?	16	
17	A. I was contacted on Instagram.	17	
18	Q. By whom?	18	
19	A. Jennifer Powers.	19	
20	Q. And did you know Ms. Powers?	20	
21	A. No.	21	
22	Q. Did you know Mr. Rubin?	22	
23	A. No.	23	
24	Q. And what did Ms. Powers say to you	24	
25	on Instagram, and what did you say to her?	25	
Page 35		Page 37	
1	██████████/Lawson	1	██████████/Lawson
2		2	
3		3	
4		4	
5		5	
6		6	
7		7	
8		8	
9		9	
10		10	
11		11	
12		12	
13		13	
14		14	
15		15	
16		16	
17		17	
18		18	
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	

10 (Pages 34 to 37)

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 42	Page 44
<p>1 [REDACTED]/Lawson</p> <p>2 Q. You don't remember that?</p> <p>3 A. I don't remember that.</p> <p>4 Q. Paragraph 310, "Still not</p> <p>5 completely convinced Lawson had phone calls</p> <p>6 with both [REDACTED] and Powers. Because of her</p> <p>7 initial skepticism, Lawson wanted as much</p> <p>8 information as she could obtain."</p> <p>9 Ms. [REDACTED], you of course are Lawson</p> <p>10 in that sentence. Do you recall, is that</p> <p>11 sentence accurate, did you have phone calls</p> <p>12 with both [REDACTED] and Powers?</p> <p>13 A. Yes.</p> <p>14 Q. And can you tell me what you recall</p> <p>15 of those phone calls?</p> <p>16 A. I don't remember.</p> <p>17 Q. You don't remember any part of</p> <p>18 them?</p> <p>19 A. It's been a long time. I don't</p> <p>20 remember. I don't want to guess.</p> <p>21 Q. Paragraph 311, "Consistent with the</p> <p>22 venture's goals and Rubin's directions, both</p> <p>23 [REDACTED] and Powers lied in all communications</p> <p>24 with Lawson, claiming Rubin was not</p> <p>25 threatening and noting that Rubin was a very</p>	<p>1 [REDACTED]/Lawson</p> <p>2 being said. Do you remember anything else</p> <p>3 that was said?</p> <p>4 A. I don't want to speculate on -- I</p> <p>5 don't want to speculate on that.</p> <p>6 Q. I don't want you to speculate, but</p> <p>7 if there's anything else you remember, please</p> <p>8 tell me.</p> <p>9 A. And I don't want to guess.</p> <p>10 Q. So you don't remember?</p> <p>11 A. No.</p> <p>12 Q. And even looking at this doesn't</p> <p>13 help you, doesn't refresh your recollection?</p> <p>14 A. No, because I don't -- this isn't</p> <p>15 my document.</p> <p>16 MR. GROVER: I'm sorry. My name is</p> <p>17 Douglas Grover, and I'm one of the</p> <p>18 attorneys on the case and I'm sitting on</p> <p>19 the side. I'm unable to hear the</p> <p>20 witness for the last sentence. Could we</p> <p>21 have that read back?</p> <p>22 MR. ROSENBERG: Do you want to read</p> <p>23 that back?</p> <p>24 (A portion of the record was read.)</p> <p>25 Q. Well, I'll ask you as best you can</p>
Page 43	Page 45
<p>1 [REDACTED]/Lawson</p> <p>2 wealthy man who enjoyed women and liked to</p> <p>3 take care of them."</p> <p>4 Do you recall, Ms. [REDACTED], whether</p> <p>5 that sentence or any part of it is true or</p> <p>6 accurate?</p> <p>7 A. I can't, I don't recall if this</p> <p>8 is -- this is not my document.</p> <p>9 Q. Understood.</p> <p>10 The next paragraph, "Powers and</p> <p>11 [REDACTED] told Lawson that Rubin liked</p> <p>12 large-breasted woman and that Rubin said he</p> <p>13 liked the photos he had seen of Lawson."</p> <p>14 Do you recall, Ms. [REDACTED], whether</p> <p>15 that statement is accurate?</p> <p>16 A. I don't recall if that was</p> <p>17 accurate.</p> <p>18 Q. And again, you don't recall</p> <p>19 anything about what Ms. Powers or Ms. [REDACTED]</p> <p>20 told you; is that correct, in August of 2016?</p> <p>21 A. I would say the one thing I can</p> <p>22 remember is that he had an [REDACTED]</p> <p>23 [REDACTED]. I remember that being said, I</p> <p>24 can't tell you who said it.</p> <p>25 Q. Okay, so you remember that was</p>	<p>1 [REDACTED] Lawson</p> <p>2 to keep your voice up.</p> <p>3 Paragraph 313, the next paragraph,</p> <p>4 "Powers reassured Lawson that she did not</p> <p>5 need to worry and that the trip would not be</p> <p>6 about sex and at most would entail some</p> <p>7 fetish play and potentially photos."</p> <p>8 Is that sentence accurate?</p> <p>9 A. I would say yes.</p> <p>10 Q. And what -- do you remember what</p> <p>11 was said in the call about, on this subject?</p> <p>12 A. I don't remember exactly what was</p> <p>13 said.</p> <p>14 Q. Generally, what was said on this</p> <p>15 subject?</p> <p>16 A. That there was photos and videos.</p> <p>17 Q. I'm sorry, when you say "That there</p> <p>18 was photos and videos," could you explain</p> <p>19 what was said?</p> <p>20 A. Photos and videos would be taken.</p> <p>21 Q. Okay. So you were told that?</p> <p>22 A. Correct.</p> <p>23 Q. You remember that?</p> <p>24 A. Yes.</p> <p>25 Q. And what was it -- okay.</p>

12 (Pages 42 to 45)

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 46	Page 48
<p>1 [REDACTED]/Lawson</p> <p>2 This refers to "some fetish play."</p> <p>3 Do you recall that being said?</p> <p>4 A. Yes.</p> <p>5 Q. And what do you remember being said</p> <p>6 about that?</p> <p>7 A. I do not -- I don't want to guess</p> <p>8 on what was said. I just knew it was a</p> <p>9 fetish job.</p> <p>10 Q. What did you understand -- okay.</p> <p>11 You said you "knew it was a fetish job."</p> <p>12 What is a fetish job?</p> <p>13 A. Can you rephrase that differently?</p> <p>14 Like?</p> <p>15 Q. Ma'am, you testified, "I just knew</p> <p>16 it was a fetish job." And my question is:</p> <p>17 What did you under -- what is a fetish job?</p> <p>18 A. It depends.</p> <p>19 Q. Tell me what it depends on.</p> <p>20 A. There is many different fetishes.</p> <p>21 Q. Had you been on fetish jobs before?</p> <p>22 A. Yes.</p> <p>23 Q. And so tell me what a fetish job</p> <p>24 is.</p> <p>25 A. Which one?</p>	<p>1 [REDACTED]/Lawson</p> <p>2 Objection, misstates testimony, but</p> <p>3 you can answer.</p> <p>4 A. Can you say that question again,</p> <p>5 please?</p> <p>6 Q. This says, "Entail -- light fetish</p> <p>7 play and potentially photos." So is it</p> <p>8 correct that you were told there might be</p> <p>9 photos or there might not be photos, correct?</p> <p>10 A. I don't remember exactly what was</p> <p>11 said.</p> <p>12 Q. Other than that there would be</p> <p>13 bondage involved?</p> <p>14 A. I don't remember exactly, I don't</p> <p>15 remember exactly what was said.</p> <p>16 Q. Did there come a time after your</p> <p>17 conversation with Ms., conversations with Ms.</p> <p>18 Powers and Ms. [REDACTED] that you agreed to go to</p> <p>19 New York to meet with Mr. Rubin?</p> <p>20 A. Yes.</p> <p>21 Q. And how much time passed between</p> <p>22 your first communications with Ms. Powers and</p> <p>23 Ms. [REDACTED] and your agreement to go to New</p> <p>24 York?</p> <p>25 A. I don't recall.</p>
Page 47	Page 49
<p>1 [REDACTED]/Lawson</p> <p>2 Q. The one you understood would be an</p> <p>3 issue with Mr. Rubin.</p> <p>4 A. Photos, videos.</p> <p>5 Q. Of what?</p> <p>6 A. Light Bondage, I suppose. I don't</p> <p>7 recall exactly what was said, so I don't want</p> <p>8 to speculate on that.</p> <p>9 Q. When you said, "light bondage, I</p> <p>10 suppose," what made you think there was a</p> <p>11 discussion of bondage?</p> <p>12 A. Because that's what I was told.</p> <p>13 Q. Okay. So you were told it would be</p> <p>14 bondage?</p> <p>15 A. Correct.</p> <p>16 Q. And this says, "Entails some fetish</p> <p>17 play and potentially photos." So is it</p> <p>18 correct that you were told there might be</p> <p>19 photos, there might not be photos, correct?</p> <p>20 A. I don't recall exactly.</p> <p>21 Q. You understood it might just</p> <p>22 involve bondage --</p> <p>23 MR. GROSSMAN: Objection --</p> <p>24 Q. -- but no photos; is that correct?</p> <p>25 MR. GROSSMAN: Sorry, counsel.</p>	<p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

13 (Pages 46 to 49)

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 50

1 [REDACTED]/Lawson

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 51

1 [REDACTED]/Lawson

2 A. I don't recall.

3 Q. Do you recall having any

4 communications with her about what you

5 expected to happen in New York?

6 A. I don't recall the conversation.

7 Q. Do you recall that there were

8 financial arrangements made before you went

9 to New York?

10 A. Can you rephrase that?

11 Q. Did you understand that you would

12 be paid for your time in New York?

13 A. Yes.

14 Q. And how much did you understand you

15 would receive for being in New York?

16 A. Initially, 2,000.

17 Q. When you say "Initially, 2,000,"

18 can you explain what that means?

19 A. That's what we were told was the

20 guarantee, 2,000.

21 Q. And was there a possibility for

22 more?

23 A. Yes.

24 Q. And what was said about the

25 possibility for more?

Page 52

1 [REDACTED]/Lawson

2 A. It depended on if he liked us.

3 Q. Who said that?

4 A. Ms. Powers.

5 Q. And what did she say about that?

6 A. If he liked us, then there could be

7 a potential for more.

8 Q. Did she say how much more?

9 A. 3,000.

10 Q. More?

11 A. Correct.

12 Q. And did you understand what you

13 would do or how you would be able to get

14 more, to get 5,000, rather than 2,000?

15 A. For the job.

16 Q. If he liked you on the job, you

17 would get 5,000?

18 A. Correct.

19 Q. What was the job?

20 What did you understand the job

21 would be?

22 MR. GROSSMAN: Objection, vague.

23 Answer if you can.

24 A. Can you rephrase that?

25 Q. What did you understand the job

Page 53

1 [REDACTED]/Lawson

2 would be?

3 A. Fetish photos, videos.

4 Q. So you would engage in fetish

5 behavior with Ms. [REDACTED]; is that what you

6 understood?

7 MR. GROSSMAN: Objection, misstates

8 testimony.

9 You can answer, if you know.

10 A. Can you say that again, please?

11 Q. Did you understand that you would

12 engage with fetish behavior with Ms. [REDACTED]?

13 A. I don't understand that. I don't

14 understand that.

15 Q. What don't you understand about the

16 question?

17 A. With her? I don't understand, no.

18 I don't recall that.

19 Q. Did there come a time, Ms. [REDACTED]

20 that you communicated with Mr. Rubin while

21 you were still in Florida, before you went to

22 New York and met him?

23 A. I don't recall.

24 Q. You don't recall that?

25 A. I don't remember.

14 (Pages 50 to 53)

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 54	Page 56
<p>1 [REDACTED]/Lawson</p> <p>2 Q. You don't recall -- if I were to</p> <p>3 suggest to you that you shared text messages</p> <p>4 with him and Ms. [REDACTED] and Ms. [REDACTED], does</p> <p>5 that refresh your recollection at all?</p> <p>6 A. I don't remember.</p> <p>7 MR. ROSENBERG: Let's show what's</p> <p>8 been marked as, previously marked as</p> <p>9 Hallman Exhibit 11.</p> <p>10 Q. Take a moment to review this, and I</p> <p>11 will represent to you that this was provided</p> <p>12 by your counsel. My question is, do you</p> <p>13 recognize this?</p> <p>14 A. I haven't seen this. I didn't go</p> <p>15 over this.</p> <p>16 Q. I'm sorry?</p> <p>17 A. I don't know. I haven't read over</p> <p>18 this.</p> <p>19 Q. Okay.</p> <p>20 Directing your attention to the</p> <p>21 fourth page, that is the next-to-last page,</p> <p>22 this appears to be an account of, a summary</p> <p>23 of text messages among a group of people.</p> <p>24 And you can see it goes in reverse</p> <p>25 chronological order. You can see by looking</p>	<p>1 [REDACTED]/Lawson</p> <p>2 Q. Do you see in the next column it</p> <p>3 says, "Remote party name" --</p> <p>4 A. Yes.</p> <p>5 Q. -- that column. And do you see it</p> <p>6 says, "[REDACTED] NYC, [REDACTED]</p> <p>7 and Howie."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Does this refresh your recollection</p> <p>11 that you had a text message or text group</p> <p>12 with [REDACTED], yourself and</p> <p>13 Howie Rubin?</p> <p>14 A. No, not by looking at this.</p> <p>15 Q. And do you see where it says,</p> <p>16 "8/17/2016 at 12:58:53 a.m.," and then it</p> <p>17 says, "Nice to meet you, Howie"?</p> <p>18 A. That's what it reads on this paper.</p> <p>19 Q. Does that refresh your recollection</p> <p>20 in any respect as to any communication you</p> <p>21 had with Mr. Rubin?</p> <p>22 A. Not by reading this document, no.</p> <p>23 Q. I want to continue through what I</p> <p>24 believe to be the text communications, so you</p> <p>25 will go back one page. That is the third</p>
Page 55	Page 57
<p>1 [REDACTED]/Lawson</p> <p>2 at the time stamp and reading the time stamp</p> <p>3 entries.</p> <p>4 And you can see, under paragraph,</p> <p>5 in paragraph, the line number 61, do you see</p> <p>6 where it says "61" on the left-hand side?</p> <p>7 A. Yes.</p> <p>8 Q. And you see it says, "126 NYC"?</p> <p>9 A. I see that.</p> <p>10 Q. And then it says outgoing message;</p> <p>11 do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. And then it has several phone</p> <p>14 numbers, do you see that?</p> <p>15 A. I see four.</p> <p>16 Q. Four phone numbers.</p> <p>17 Do you recognize any of the phone</p> <p>18 numbers?</p> <p>19 A. Just mine.</p> <p>20 Q. Which one is yours?</p> <p>21 A. [REDACTED].</p> <p>22 Q. Okay.</p> <p>23 Do you recognize Ms. [REDACTED] phone</p> <p>24 number, among these three?</p> <p>25 A. I don't.</p>	<p>1 [REDACTED]/Lawson</p> <p>2 page in this document.</p> <p>3 Do you see where it says, "Line</p> <p>4 55"?</p> <p>5 A. Yes, I see line 55.</p> <p>6 Q. And do you see, reading over</p> <p>7 "Remote party name," it says "Howie"?</p> <p>8 A. I see that.</p> <p>9 Q. And further to the right it says,</p> <p>10 this is at 8:17. At 4:52 p.m., it says,</p> <p>11 "Nice to meet you, ladies." Do you see that?</p> <p>12 A. That's what it reads here.</p> <p>13 Q. Yes. Same question: Does this</p> <p>14 refresh your recollection at all as to any</p> <p>15 communication you had with Mr. Rubin at this</p> <p>16 time?</p> <p>17 A. No, not -- no.</p> <p>18 Q. Okay. Going up five lines to line</p> <p>19 number 50, do you see that?</p> <p>20 A. I see line 50.</p> <p>21 Q. And do you see where it says,</p> <p>22 "Incoming message," and again, it says,</p> <p>23 "Howie," and this is on the same day,</p> <p>24 8/17/2016 at 6:45 p.m. and 16 seconds; do you</p> <p>25 see that?</p>

15 (Pages 54 to 57)

CONFIDENTIAL INFORMATION GOVERNED BY PROTECTIVE ORDER

Page 58	Page 60
<p>1 [REDACTED]/Lawson</p> <p>2 A. That's what it says.</p> <p>3 Q. And do you see where it says, "Do</p> <p>4 you girls know what you are in for"?</p> <p>5 A. "Do you girls know what you are in</p> <p>6 for?" Yes I see that.</p> <p>7 Q. Does this refresh your recollection</p> <p>8 as to anything, as to any communication with</p> <p>9 Mr. Rubin?</p> <p>10 A. I -- no. I don't remember.</p> <p>11 Q. You don't remember this</p> <p>12 communication at all?</p> <p>13 A. Not, not going off of this.</p> <p>14 Q. The line immediately above that,</p> <p>15 49, line 49, which is immediately at 6:52:49</p> <p>16 p.m., do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And it says, "[REDACTED] told us the</p> <p>19 basics. We are definitely excited about</p> <p>20 this." Do you see that?</p> <p>21 A. I see that, I see it.</p> <p>22 Q. Does this refresh your recollection</p> <p>23 as to what [REDACTED] had told you about what</p> <p>24 would happen in New York?</p> <p>25 A. It does not.</p>	<p>1 [REDACTED] Lawson</p> <p>2 A. It looks like a carrot. I don't</p> <p>3 know. But I don't think it is. I don't</p> <p>4 know.</p> <p>5 Q. Do you know what the next emoji is,</p> <p>6 on 47?</p> <p>7 A. That appears to be a double face.</p> <p>8 Q. Do you know what that means?</p> <p>9 MR. GROSSMAN: Objection, calls for</p> <p>10 speculation.</p> <p>11 But answer if you can.</p> <p>12 A. I mean the double face.</p> <p>13 Q. What does it mean?</p> <p>14 A. I don't know.</p> <p>15 Q. Did you send these emojis?</p> <p>16 A. I don't know. I don't remember. I</p> <p>17 don't know if that's my -- if this is mine.</p> <p>18 Q. And what is the last -- on line 48,</p> <p>19 do you know what that is?</p> <p>20 A. I don't know. It's tiny.</p> <p>21 Q. On line 45, do you see line 45?</p> <p>22 A. I do.</p> <p>23 Q. And you see there appears to be a</p> <p>24 message from Mr. Rubin, in that line?</p> <p>25 A. Yes.</p>
Page 59	Page 61
<p>1 [REDACTED]/Lawson</p> <p>2 Q. Going up the next several lines,</p> <p>3 you'll notice -- the next three lines, you</p> <p>4 will notice that there are emojis in the</p> <p>5 space that says "Content"?</p> <p>6 A. What line?</p> <p>7 Q. Lines 46, 47 and 48; do you see</p> <p>8 that?</p> <p>9 A. I see 46. I see 47. I see 48.</p> <p>10 Q. And you see there are emojis in the</p> <p>11 "Content" line?</p> <p>12 A. Yes.</p> <p>13 Q. Let's take them one at a time. And</p> <p>14 I wonder if you can tell me if you know what</p> <p>15 the emojis are.</p> <p>16 Do you know what the first emoji is</p> <p>17 on line 48?</p> <p>18 MR. GROSSMAN: Objection, calls for</p> <p>19 speculation.</p> <p>20 Answer, if you can answer.</p> <p>21 A. I thought the first line was 46.</p> <p>22 Q. Okay, we'll start at 46.</p> <p>23 Do you know what that emoji is?</p> <p>24 A. I do not.</p> <p>25 Q. Do you know who sent -- I'm sorry.</p>	<p>1 [REDACTED] Lawson</p> <p>2 Q. Now do you see it says, "It's total</p> <p>3 BDSM. Most girls love it and come back for</p> <p>4 more, but I just like to be upfront about</p> <p>5 everything."</p> <p>6 Do you see that?</p> <p>7 A. That's what it reads.</p> <p>8 Q. Do you know what BDSM is?</p> <p>9 A. I do not know what that stands for.</p> <p>10 Q. Do you have any idea what that</p> <p>11 stands for?</p> <p>12 A. I do not.</p> <p>13 Q. Did you, in 2016, have any idea</p> <p>14 what that stood for?</p> <p>15 No?</p> <p>16 A. No.</p> <p>17 Q. Do you recall Mr. Rubin telling you</p> <p>18 that your meeting with him would be total</p> <p>19 BDSM?</p> <p>20 A. I don't -- by looking at this</p> <p>21 document, I don't recall.</p> <p>22 Q. My question is, do you remember</p> <p>23 that?</p> <p>24 A. No.</p> <p>25 Q. But you don't deny that he told you</p>

16 (Pages 58 to 61)

Page 62	Page 64
<p>1 [REDACTED]/Lawson 2 that, do you? 3 MR. GROSSMAN: Objection, misstates 4 testimony. 5 MR. ROSENBERG: I didn't misstate 6 any testimony. 7 Q. Do you deny that he told you that? 8 A. I don't remember this. 9 Q. I didn't ask you that. I think we 10 have the answer. 11 Let's continue up, continue here to 12 line 37. 13 Are you on 37? 14 A. I am. 15 Q. Great. 16 And you'll see that that indicates 17 an incoming message, and the remote party 18 name was Howie, do you see that? 19 A. I see it. 20 Q. And you see it's on August 21st in 21 2016? 22 A. I see that. 23 Q. And do you see it says, it's at ten 24 25 and 40 seconds in the evening? 25 A. I see that.</p>	<p>1 [REDACTED]/Lawson 2 A. Yes, I see that. 3 Q. Does that refresh your recollection 4 about any conversation you had with Mr. 5 Rubin? 6 A. I don't remember. 7 Q. You don't remember? 8 A. Uh-uh. 9 Q. Now, if you go to the very, the 10 second page of the exhibit, and this will be 11 line 32, which indicates -- are you on line 12 32? The bottom of the page, I think the 13 second page of the exhibit. 14 Yes, the bottom of that page. 15 A. This first one? 16 Q. Yes, ma'am. Do you see line 32? 17 A. I'm on line 32. 18 Q. Great. And do you see that that is 19 a message that appears to be August 21st, 20 2016, at 10:49:38 seconds in the evening? 21 A. That's what it says on this 22 document. 23 Q. And you see it's, and the content 24 is "Going to be super fun. We are excited." 25 Do you see that?</p>
Page 63	Page 65
<p>1 [REDACTED]/Lawson 2 Q. And do you see where it says, 3 "Ladies, can't wait to [REDACTED] you 4 tomorrow [double face]"? 5 A. I see that. 6 Q. Do you recall that message? 7 A. I do not recall the messages. 8 Q. Do you have an understanding of 9 what it means to say that he would [REDACTED] you 10 tomorrow? 11 MR. GROSSMAN: Objection, calls for 12 speculation. 13 You can answer, if you can. 14 A. No. 15 Q. No understanding? 16 A. I don't -- I don't recall this. 17 I'm sorry. 18 Q. Let me ask you this: In the line 19 immediately above the one I just directed 20 your attention to, so now turning to line 37 21 -- excuse me, directing your attention to 22 line 36, indicates a message, "But the 23 [REDACTED] bar first, so we can all get 24 intoxicated," and then with an emoji. 25 Do you see that?</p>	<p>1 [REDACTED]/Lawson 2 A. I see it. 3 Q. Do you recall stating in the text 4 to Howie, to Mr. Rubin that you were 5 anticipating this would be super fun, and you 6 were excited? 7 A. I don't recall any of this. 8 Q. Do you recall [REDACTED] saying that at 9 any time? 10 A. I don't recall. 11 Q. How did you get to New York in 12 August of 2016? 13 A. Flight. 14 Q. How was the flight arranged? 15 A. Jennifer Powers. 16 Q. Ms. Powers arranged for you to come 17 to New York. Did she pay for the flight? 18 MR. GROSSMAN: Objection, calls for 19 speculation. 20 But answer if you can. 21 A. Did she pay for it? 22 Q. Yes, did you pay -- 23 MR. ROSENBERG: Withdrawn. 24 Q. Did you pay for the flight? 25 A. I did not.</p>

Page 66

1 [REDACTED]/Lawson
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

Page 67

1 [REDACTED]/Lawson
2 August 22nd your flight was delayed somewhat?
3 A. I don't remember.
4 Q. Do you recall that she gave you
5 instructions about where to go, when you
6 arrived?
7 A. I don't remember.
8 Q. Do you recall that you went to --
9 she asked you to come to New York, and you
10 agreed to come to New York, correct?
11 A. She asked me to come to New York,
12 and I agreed.
13 Q. And you agreed to, correct?
14 A. Yes.
15 Q. And no one forced you to come to
16 New York, correct?
17 A. No.
18 Q. You came of your own free will?
19 A. Yes.
20 Q. You came because you wanted to get
21 paid, correct?
22 A. Yeah.
23 Q. And when you went to the airport
24 from your home, you went alone, correct?
25 A. Yes.

Page 68

1 [REDACTED]/Lawson
2 Q. You got on the airplane and you
3 flew alone to New York, didn't you?
4 A. Yes.
5 Q. And you flew, and you knew that you
6 would meet Ms. [REDACTED] in New York, correct?
7 A. I knew that she was going to be
8 there, yes.
9 Q. And you knew that you and she would
10 meet with Mr. Rubin, correct?
11 A. Yes.
12 Q. And do you recall where you went
13 first, when you arrived in New York?
14 A. The -- I want to say the penthouse.
15 Q. I'm sorry?
16 A. The penthouse.
17 Q. Okay. What is the penthouse?
18 A. What is the penthouse?
19 Q. You say, "I want to say the
20 penthouse."
21 When you refer to "the penthouse,"
22 what are you referring to?
23 A. The penthouse where we met.
24 Q. Where you met with Mr. Rubin?
25 A. With Jen.

Page 69

1 [REDACTED]/Lawson
2 Q. Well, let's take it step by step.
3 How did you get from the airport to
4 the penthouse?
5 A. Probably an Uber.
6 Q. And were you traveling alone at
7 that time?
8 A. Yes.
9 Q. You got to the penthouse, and you
10 went up to the penthouse. Where was the
11 penthouse, if you recall?
12 A. I don't recall.
13 Q. Was it in midtown Manhattan?
14 A. I don't recall.
15 Q. Had you been to New York before?
16 A. Yes.
17 Q. Had you been, had you been there on
18 a few occasions, on many occasions?
19 A. Maybe once.
20 Q. Just once before?
21 A. I don't remember.
22 Q. You don't remember.
23 A. I don't remember exactly.
24 Q. When you arrived in the penthouse
25 --

Page 70	Page 72
<p>1 [REDACTED]/Lawson 2 MR. ROSENBERG: Just one second. 3 Q. When you arrived at the penthouse, 4 what did you do? 5 A. I took the elevator up to the top 6 floor. 7 Q. And was anybody there? 8 A. Was anybody on the top floor? 9 Q. Yes. 10 A. No. 11 Q. Was Ms. Lawson -- forgive me. Was 12 Ms. [REDACTED] already there? 13 A. I knocked on the door. 14 Q. Okay. And you went in, or did 15 someone answer the door? 16 A. Yes. 17 Q. Who answered the door? 18 A. Jennifer Powers. 19 Q. So you hadn't met her before? 20 A. No. 21 Q. This is the first time? 22 A. Correct. 23 Q. Was anyone else present? 24 A. [REDACTED]. 25 Q. Ms. [REDACTED]. Anybody else present?</p>	<p>1 [REDACTED]/Lawson 2 the three of you when you signed the form? 3 A. I don't remember. I want to say 4 no. 5 Q. When you say, "I want to say no," 6 it's your belief that there was no one else 7 present, just the three of you? 8 A. My belief, that is my belief. 9 Q. And you don't recall anything 10 about, anything that was said in connection 11 with the signing of this document, correct? 12 A. I don't want to speculate on what 13 was said. I don't remember exactly. 14 Q. So you don't remember. 15 Let me show you what I will ask to 16 you to mark as [REDACTED] Exhibit 1. 17 (Lawson Exhibit 1, Confidentiality 18 Agreement and Release, Bates Nos. 19 HR000049 and HR000050, marked for 20 identification, this date.) 21 MR. GROSSMAN: I would just ask you 22 to mark this Lawson Exhibit 1, just to 23 keep it consistent. 24 MR. ROSENBERG: Fair enough. 25 Lawson Exhibit 1.</p>
Page 71	Page 73
<p>1 [REDACTED]/Lawson 2 A. Not that I can remember. 3 Q. Approximately what time was it that 4 you arrived? 5 A. I don't know. 6 Q. And what happened after you arrived 7 at the penthouse? 8 A. We were greeted by Jennifer Powers. 9 Q. And what happened next? What did 10 she say at that time and what did you say? 11 A. We were given forms. 12 Q. And what did you do with them? 13 A. Signed them. 14 Q. Did you have any discussion about 15 them? 16 A. I believe there was. I can't 17 recall. 18 Q. You don't remember what was said 19 about them? 20 A. Uh-uh. 21 Q. She gave it to you and you signed 22 the form. 23 Did you read it before signing it? 24 A. No. 25 Q. Was anyone else present other than</p>	<p>1 [REDACTED]/Lawson 2 Q. Please take a moment to look at 3 Lawson Exhibit 1 and tell me if you recognize 4 it. 5 Do you recognize it? 6 A. I don't remember. 7 Q. Do you -- I'm not quite sure if I 8 understand, "I don't remember." 9 Do you recognize this or not? 10 A. I don't, I don't recognize it. 11 Obviously just all the way down, but -- 12 Q. When you say, "Obviously just all 13 the way down," just so the record is clear, 14 there are initials running down the left-hand 15 side of the page. Are those, did you write 16 those initials, does that appear to be your 17 handwriting? 18 A. I scribbled those, yes. 19 Q. You think you did, okay, fine. 20 And on the back page it's signed 21 "[REDACTED]" 22 Does that appear to be your 23 signature? 24 A. It appears to be. 25 Q. Okay. And what about the date</p>

Page 74	Page 76
<p>1 [REDACTED]/Lawson 2 that's written in, do you think you wrote 3 that date? 4 A. Yeah. 5 Q. Does that look like your 6 handwriting there? 7 A. Yeah. 8 Q. And does that say, 8/22/16? 9 A. Yeah, I would think. 10 Q. Does that appear to be 8/22/16? 11 A. Yeah, it looks like a 2 or an 8. 12 Q. But you recall you wrote the date 13 that you were in New York and the date that 14 you signed it, correct? 15 A. If that was the date. 16 Q. Now, before you signed it, did you 17 have any conversation with Ms. [REDACTED] about 18 it? 19 A. No. 20 Q. She signed it. Did she sign hers 21 at the same time you signed yours? 22 A. I don't recall. 23 Q. Did you say, wait, I want more time 24 to review this? 25 A. No.</p>	<p>1 [REDACTED]/Lawson 2 record at 12:27 p.m. This begins disk 2 3 of the deposition of Hillary Lawson. 4 Q. Ms. Lawson, we just discussed your 5 signing of the NDA in the penthouse. 6 After you signed the NDA, what 7 happened next? 8 A. We went to the [REDACTED]. 9 Q. Did you have anything to drink? 10 Before you went to the [REDACTED] did you have 11 a drink at the penthouse? 12 A. I don't remember. 13 Q. Do you recall any discussion with 14 Ms. Powers or Ms. [REDACTED] in the penthouse? 15 A. I don't want to speculate. I don't 16 remember exactly. 17 Q. And you testified then that you, so 18 at some point you left the penthouse and went 19 to the [REDACTED]? 20 A. Yes. 21 Q. Approximately how long were you in 22 the penthouse before, before you went to the 23 [REDACTED]? 24 A. I don't remember. 25 Q. Can you approximate?</p>
Page 75	Page 77
<p>1 [REDACTED] Lawson 2 Q. You just received it and you signed 3 it? 4 A. Yeah. 5 Q. And after you signed this document, 6 or at any time when you signed the document, 7 did you note that it stated in the second 8 paragraph, "I have voluntarily agreed to 9 engage in sexual activity with (Rubin), 10 including Sadoomasochistic (SM) activity that 11 can be hazardous and on occasion cause injury 12 to my person." 13 Do you see that? 14 A. I see that's what's written here. 15 Q. Did you read that at the time? 16 A. I did not. 17 Q. Okay. 18 MR. ROSENBERG: We have two minutes 19 to the end. Why don't we just end this. 20 THE VIDEOGRAPHER: We're going off 21 the record at 12:10 p.m. This concludes 22 tape 1 of the videotape deposition of 23 Ms. Hillary Lawson. 24 (A brief recess was taken.) 25 THE VIDEOGRAPHER: We are on the</p>	<p>1 [REDACTED]/Lawson 2 A. I can't. 3 Q. How did you get to the [REDACTED]? 4 A. I believe we walked. 5 Q. Did Ms. Powers walk with you, or 6 was it just you and Ms. [REDACTED]? 7 A. I don't remember. 8 Q. Had you ever been to the [REDACTED] 9 before? 10 A. No. 11 Q. And what did you do when you got 12 there? 13 A. We went to the [REDACTED]. 14 Q. What happened when you got to 15 the -- when you say "we," it's you and Ms. 16 [REDACTED]? 17 A. Yes. 18 Q. And what happened when you got to 19 the [REDACTED]? 20 A. We were seated. 21 Q. And what happened next? 22 A. We met Howard. 23 Q. So you met him at the [REDACTED] 24 [REDACTED]? 25 A. Correct.</p>

Page 78	Page 80
<p>1 [REDACTED]/Lawson</p> <p>2 Q. And what happened when you met Mr.</p> <p>3 Rubin?</p> <p>4 A. We sat down at a table.</p> <p>5 Q. Did you have a discussion, did you</p> <p>6 have dinner, did you have drinks? Can you</p> <p>7 please describe what happened next?</p> <p>8 A. Drinks were ordered.</p> <p>9 Q. Did anyone force you to drink?</p> <p>10 A. No.</p> <p>11 Q. You chose to drink, correct?</p> <p>12 A. We had drinks ordered for us.</p> <p>13 Q. And you had the drinks, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And then you ate dinner?</p> <p>16 A. I don't, I don't recall.</p> <p>17 Q. What did you discuss with Mr.</p> <p>18 Rubin?</p> <p>19 A. I don't remember what exactly was</p> <p>20 discussed.</p> <p>21 Q. Do you remember anything about what</p> <p>22 you discussed with him at that time?</p> <p>23 A. I don't want to guess.</p> <p>24 Q. I take it that means, without</p> <p>25 guessing, do you have any recollection of</p>	<p>1 [REDACTED]/Lawson</p> <p>2 Q. And did you do that?</p> <p>3 A. Yes.</p> <p>4 Q. And what did you change into?</p> <p>5 A. Black outfits.</p> <p>6 Q. Had you brought those black outfits</p> <p>7 with you?</p> <p>8 A. We were told to.</p> <p>9 Q. When were you told to?</p> <p>10 A. I don't remember.</p> <p>11 Q. You don't remember when you were</p> <p>12 told to bring black outfits?</p> <p>13 A. I can't give a date.</p> <p>14 Q. But your recollection now is you</p> <p>15 were told to bring black outfits, and so you</p> <p>16 did so, correct?</p> <p>17 A. [REDACTED] brought the outfits, correct.</p> <p>18 Q. So you didn't bring an outfit, [REDACTED]</p> <p>19 did?</p> <p>20 A. [REDACTED] brought them.</p> <p>21 Q. She brought them for both of you?</p> <p>22 A. Yes.</p> <p>23 Q. And when you say black outfits,</p> <p>24 were these lingerie?</p> <p>25 A. No.</p>
Page 79	Page 81
<p>1 [REDACTED]/Lawson</p> <p>2 what was discussed at that dinner?</p> <p>3 A. I don't know.</p> <p>4 Q. How long was the dinner?</p> <p>5 A. I don't know.</p> <p>6 Q. Did there come a time that you went</p> <p>7 back to the penthouse?</p> <p>8 A. Yes.</p> <p>9 Q. And when did -- and did you and Ms.</p> <p>10 [REDACTED] and Mr. Rubin go together to the</p> <p>11 penthouse?</p> <p>12 A. Yes.</p> <p>13 Q. And can you tell me what happened</p> <p>14 when you arrived at the penthouse?</p> <p>15 A. We went up to the penthouse. We</p> <p>16 went up to the penthouse.</p> <p>17 Q. And what did you do there?</p> <p>18 A. We went inside.</p> <p>19 MR. MCDONALD: Keep your voice up,</p> <p>20 please.</p> <p>21 Q. And what did you do after you went</p> <p>22 inside?</p> <p>23 A. We went inside.</p> <p>24 Q. And then what happened?</p> <p>25 A. We were told to go change.</p>	<p>1 [REDACTED]/Lawson</p> <p>2 Q. Describe, please, the outfits.</p> <p>3 A. Black leather.</p> <p>4 Q. I'm sorry?</p> <p>5 A. Black leather.</p> <p>6 Q. Black leather. And black leather,</p> <p>7 could you please give more description? Was</p> <p>8 it a black leather dress, a black leather</p> <p>9 brassiere, black leather boots? What was it?</p> <p>10 A. It was not any of those.</p> <p>11 Q. Okay, so what was it, ma'am?</p> <p>12 A. Just describe it to you?</p> <p>13 Q. Please.</p> <p>14 A. A black leather here, black leather</p> <p>15 here, black leather here. One piece, I would</p> <p>16 say.</p> <p>17 Q. One piece?</p> <p>18 A. Sure.</p> <p>19 Q. And it just covered your breasts</p> <p>20 and your midsection?</p> <p>21 A. It covered us like a one-piece.</p> <p>22 Q. A one-piece.</p> <p>23 A. With holes.</p> <p>24 Q. And was that something that you'd,</p> <p>25 had you worn similar outfits before?</p>

Page 82	Page 84
<p>1 [REDACTED]/Lawson</p> <p>2 A. I don't remember.</p> <p>3 Q. In any of the fetish sessions that</p> <p>4 you've had before, had you ever worn that</p> <p>5 outfit?</p> <p>6 A. No.</p> <p>7 Q. No?</p> <p>8 A. No.</p> <p>9 Q. Had you ever worn, in any of the</p> <p>10 sessions you had before, had you ever worn an</p> <p>11 outfit similar to that one?</p> <p>12 A. I don't remember.</p> <p>13 Q. So you got into black leather</p> <p>14 outfits. And I take it, was that the only</p> <p>15 thing you were wearing, just the black</p> <p>16 leather outfit, nothing else?</p> <p>17 A. I don't remember.</p> <p>18 Q. You weren't wearing anything on top</p> <p>19 of it, or you weren't wearing -- do you</p> <p>20 recall your shoes or any other aspect of</p> <p>21 clothing you were wearing?</p> <p>22 A. I don't remember that.</p> <p>23 Q. And did you and Ms. [REDACTED] have</p> <p>24 identical outfits?</p> <p>25 A. I don't remember if they were</p>	<p>1 [REDACTED] Lawson</p> <p>2 Q. Did you and he and Ms. [REDACTED]</p> <p>3 discuss anything while you were smoking?</p> <p>4 A. I don't recall what was discussed.</p> <p>5 Q. How long did you and Ms. [REDACTED]</p> <p>6 smoke for?</p> <p>7 A. Don't know an approximate time.</p> <p>8 MR. MCDONALD: Can you please keep</p> <p>9 your voice up?</p> <p>10 MR. ROSENBERG: Counsel, there's</p> <p>11 two seats at the table, and you're</p> <p>12 sitting by the door on the outside of</p> <p>13 the room. If you'd like, you can sit at</p> <p>14 the table, and you can maybe hear</p> <p>15 better.</p> <p>16 MR. MCDONALD: Where are the seats?</p> <p>17 THE WITNESS: You can sit right</p> <p>18 here, I don't mind. If you want to.</p> <p>19 MR. MCDONALD: Just keep your voice</p> <p>20 up, please.</p> <p>21 THE WITNESS: Well, if you can't</p> <p>22 hear, you're welcome to sit next to me.</p> <p>23 MR. MCDONALD: Why don't you keep</p> <p>24 your voice up.</p> <p>25 Q. Ms. [REDACTED] [sic] -- Ms. [REDACTED],</p>
Page 83	Page 85
<p>1 [REDACTED]/Lawson</p> <p>2 identical.</p> <p>3 Q. Were they similar?</p> <p>4 A. Sure.</p> <p>5 Q. What happened after you changed</p> <p>6 into this clothing?</p> <p>7 A. We were given a drink.</p> <p>8 Q. And did you have the drink?</p> <p>9 A. Yes.</p> <p>10 Q. And what happened after you had the</p> <p>11 drink?</p> <p>12 A. [REDACTED] wanted to smoke.</p> <p>13 Q. And what happened?</p> <p>14 A. She smoked.</p> <p>15 Q. What did you do while she was</p> <p>16 smoking?</p> <p>17 A. I smoked with her.</p> <p>18 Q. Okay. Where did you smoke?</p> <p>19 A. By a window.</p> <p>20 Q. And was that -- were you both</p> <p>21 smoking cigarettes?</p> <p>22 A. Correct.</p> <p>23 Q. And what was Mr. Rubin doing while</p> <p>24 you were smoking cigarettes?</p> <p>25 A. Sitting on the couch.</p>	<p>1 [REDACTED] Lawson</p> <p>2 after you and Ms. [REDACTED] finished your</p> <p>3 cigarettes, what happened next?</p> <p>4 A. Everything -- it's kind of blurry,</p> <p>5 to be honest.</p> <p>6 Q. Everything is blurry. So you don't</p> <p>7 remember what happened next?</p> <p>8 A. Parts.</p> <p>9 Q. Okay. One question about the black</p> <p>10 leather outfit: Did it cover your buttocks?</p> <p>11 A. I don't know.</p> <p>12 Q. You don't know? You were wearing</p> <p>13 it.</p> <p>14 A. I don't remember.</p> <p>15 Q. You don't remember. I wasn't clear</p> <p>16 from the way you were describing it. Did it</p> <p>17 cover your vagina as well?</p> <p>18 A. Yes.</p> <p>19 Q. It did?</p> <p>20 A. Yes, it did.</p> <p>21 Q. Okay. So -- I'm sorry, you said</p> <p>22 that after you finished the, your cigarette,</p> <p>23 things became blurry, you don't remember</p> <p>24 things. Tell me what you do remember.</p> <p>25 A. I was asked to sit on the couch.</p>

Page 86

1 [REDACTED] Lawson
2 Q. And then what happened?
3 A. [REDACTED].
4 Q. Were you paid money at some point,
5 Ms. [REDACTED]?
6 A. At that point?
7 Q. Yes.
8 A. Not at that point.
9 Q. Not at that point.
10 There came a time when you were
11 paid, correct?
12 A. There came a time.
13 Q. In that night that you were paid,
14 correct?
15 A. Yes.
16 Q. And when were you paid the cash,
17 the money?
18 A. At the end.
19 Q. Why don't you tell me what happened
20 after you were [REDACTED].
21 A. I remember saying that, not to,
22 [REDACTED].
23 Q. And what happened next?
24 A. [REDACTED].
25 Q. And then did there come a time

Page 87

1 [REDACTED] Lawson
2 that -- describe everything that happened
3 that night and all of your interaction with,
4 that you recall with Mr. Rubin and
5 Ms. [REDACTED].
6 A. Can you ask that different, can you
7 just step by step, please.
8 Q. No, ma'am, I just want you to tell
9 me what happened that night, after Mr. Rubin
10 hit you in the face.
11 A. We were brought into a room.
12 Q. Continue.
13 MR. GROSSMAN: Objection. That's
14 not a question.
15 Q. Can you please continue?
16 Do you remember anything else that
17 happened?
18 A. After we were brought into the
19 room?
20 Q. Yes.
21 A. I remember seeing red walls.
22 Q. Do you remember anything else?
23 A. I remember my feet were tied.
24 Q. Your feet were tied?
25 A. Uh-huh.

Page 88

1 [REDACTED] Lawson
2 Q. Okay. Do you remember anything
3 else?
4 A. I remember [REDACTED] head being
5 punched, back of her head.
6 Q. Do you remember anything else
7 happening to you?
8 A. I was told to hit her. And that
9 [REDACTED]
10 [REDACTED].
11 Q. And what else do you remember
12 happening?
13 A. I hit my, I hit my leg, so it would
14 sound like I hit her.
15 Q. So you didn't actually hit her; is
16 that correct?
17 A. Uh-huh.
18 Q. And what else happened that night?
19 Do you remember anything else that happened
20 that night?
21 A. He noticed that I didn't hit her,
22 so I got [REDACTED] for that.
23 Q. Where did you get [REDACTED]?
24 A. My [REDACTED].
25 Q. Do you remember anything else that

Page 89

1 [REDACTED] Lawson
2 happened that night?
3 A. No.
4 Q. Nothing else?
5 A. I don't know. I don't remember.
6 Q. Now, how long did this episode with
7 Mr. Rubin and Ms. [REDACTED] last?
8 A. I don't remember.
9 Q. You recall that there came a time
10 that you were paid \$5,000, correct?
11 A. I recall money being thrown at us.
12 Q. Do you remember how much it was?
13 A. I don't know.
14 Q. Isn't it a fact, ma'am, that it was
15 \$5,000?
16 A. Yes.
17 Q. Yes, it was. Okay.
18 And do you remember -- did there
19 come a time that Mr. Rubin left?
20 A. Yes.
21 Q. How long -- and do you remember
22 what time he left?
23 A. No.
24 Q. Your complaint alleges that the
25 episode between, among you, Ms. [REDACTED] and

Page 90	Page 92
<p>1 [REDACTED]/Lawson</p> <p>2 Mr. Rubin lasted approximately one hour.</p> <p>3 Does that sound about right?</p> <p>4 A. I don't remember.</p> <p>5 Q. Okay. He paid you before he left,</p> <p>6 did he not?</p> <p>7 A. The money was thrown at us, yes.</p> <p>8 Q. You were able to collect the money</p> <p>9 and he left, correct?</p> <p>10 A. Obviously.</p> <p>11 Q. And then you and Ms. [REDACTED] were</p> <p>12 present in the, in the hotel room -- excuse</p> <p>13 me, in the penthouse; is that correct, after</p> <p>14 the money was paid to you?</p> <p>15 A. Yes.</p> <p>16 Q. And you were alone in the</p> <p>17 penthouse, just you and she, correct?</p> <p>18 MR. GROSSMAN: Objection, calls for</p> <p>19 speculation.</p> <p>20 But answer, if you know.</p> <p>21 A. I don't know. I don't know.</p> <p>22 Q. You don't know?</p> <p>23 A. I don't know.</p> <p>24 Q. So there might have been --</p> <p>25 A. Who knows?</p>	<p>1 [REDACTED] Lawson</p> <p>2 remained in the apartment; is that correct?</p> <p>3 A. We stayed at the apartment.</p> <p>4 Q. You stayed there for the night, did</p> <p>5 you not?</p> <p>6 A. Yes. Yes.</p> <p>7 Q. You understood that Mr. Rubin could</p> <p>8 come back at any time, didn't you?</p> <p>9 MR. GROSSMAN: Objection, calls for</p> <p>10 speculation.</p> <p>11 But answer if you can.</p> <p>12 MR. ROSENBERG: No, it was about</p> <p>13 her understanding.</p> <p>14 A. I don't know.</p> <p>15 Q. You don't know?</p> <p>16 The complaint alleges that Lawson</p> <p>17 and Hallman, who had nowhere else to go,</p> <p>18 stayed in the penthouse for the night.</p> <p>19 Does that sound accurate to you,</p> <p>20 you had nowhere else to go at that point?</p> <p>21 A. Does what you're reading sound</p> <p>22 accurate, is that what you're asking me?</p> <p>23 Q. Yes.</p> <p>24 A. If that's what it's saying on that</p> <p>25 paper. I don't know if that's accurate.</p>
Page 91	Page 93
<p>1 [REDACTED]/Lawson</p> <p>2 Q. But Mr. Rubin was gone, correct?</p> <p>3 A. Yeah. Yes.</p> <p>4 Q. And what did you do after Mr. Rubin</p> <p>5 left?</p> <p>6 A. I don't know.</p> <p>7 Q. I'm sorry?</p> <p>8 A. I don't know.</p> <p>9 Q. Did you call anyone at that point?</p> <p>10 A. I don't know.</p> <p>11 Q. You don't know?</p> <p>12 A. No, I don't know.</p> <p>13 Q. Did you call the police?</p> <p>14 A. No.</p> <p>15 Q. Did you call anyone that you knew,</p> <p>16 to say what had happened to you?</p> <p>17 A. I don't recall.</p> <p>18 Q. Did you send any text messages to</p> <p>19 anyone to say what had happened to you?</p> <p>20 A. I don't, I don't remember. I, I</p> <p>21 was out of my mind.</p> <p>22 Q. Did you call any friend of yours to</p> <p>23 tell you what had happened to you?</p> <p>24 A. I don't remember.</p> <p>25 Q. And what did you -- and you</p>	<p>1 [REDACTED] Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

Page 94	Page 96
<p>1 [REDACTED]/Lawson 2 Do you recall leaving the next day, 3 Ms. [REDACTED]? 4 A. Yes. 5 Q. And what time did you leave the 6 next day? 7 A. I don't remember. 8 Q. How did you -- where did you go the 9 next day? 10 A. To the airport. 11 Q. And then did you fly home? 12 A. Yes. 13 Q. Let me show you what's been marked 14 as Hallman Exhibit 17. Do you recognize 15 Hallman Exhibit 17? Do you recognize this? 16 A. Yes, I recognize this photo. 17 Q. And what do you recognize it as? 18 A. It's a photo of [REDACTED] 19 Q. And where is the photo? 20 A. New York. 21 Q. Where in New York? 22 A. It says [REDACTED] on 23 this document. 24 Q. Do you recognize this is a picture 25 that was taken of you at the [REDACTED] on the</p>	<p>1 [REDACTED]/Lawson 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>
Page 95	Page 97
<p>1 [REDACTED]/Lawson 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p>1 [REDACTED]/Lawson 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>

25 (Pages 94 to 97)

<p>Page 126</p> <p>1 [REDACTED] /Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 128</p> <p>1 [REDACTED] /Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p>Page 127</p> <p>1 [REDACTED] /Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 129</p> <p>1 [REDACTED] /Lawson</p> <p>2 bruised or not bruised; is that correct?</p> <p>3 A. Can you rephrase that?</p> <p>4 Q. The fact that you were wearing</p> <p>5 spray paint would not tell us whether you</p> <p>6 were bruised or not bruised; is that correct?</p> <p>7 A. I don't understand.</p> <p>8 Q. Were you able to wear spray paint</p> <p>9 even though this was in a pool? Can you wear</p> <p>10 spray paint even in the water?</p> <p>11 A. Yeah.</p> <p>12 Q. It stays on?</p> <p>13 A. Sure.</p> <p>14 Q. Did there come a time that you met</p> <p>15 Mr. Rubin again?</p> <p>16 A. Yes.</p> <p>17 Q. And how did you come to meet him?</p> <p>18 To see him again?</p> <p>19 A. In New York.</p> <p>20 Q. And how did it come about that you</p> <p>21 met him then?</p> <p>22 Did you contact him?</p> <p>23 A. I don't remember how. I don't</p> <p>24 remember.</p> <p>25 Q. But in some fashion, you and he</p>

33 (Pages 126 to 129)

Page 130	Page 132
<p>1 [REDACTED]/Lawson 2 were connected again? 3 A. Correct. 4 Q. And was that -- did you connect 5 through text message, through e-mail, through 6 phone; how? 7 A. I don't remember. 8 Q. Your complaint alleges that you and 9 he met again in December of 2016. 10 Does that sound like the right time 11 that you met? 12 A. I don't know. I don't remember the 13 exact date. 14 Q. Your complaint alleges that you 15 found yourself in a tough financial situation 16 at about that time. Is that correct, were 17 you in a tough financial situation when you 18 were meeting him the second time? 19 A. I could have been. I don't 20 remember. 21 Q. You don't remember. 22 Did you keep in touch, after your 23 first meeting with Mr. Rubin, did you keep in 24 touch with Mr. Rubin and Ms. Powers via 25 WhatsApp?</p>	<p>1 [REDACTED]/Lawson 2 A. I don't remember. 3 Q. You don't remember if that's the 4 case? 5 A. I don't remember. 6 Q. I think you testified earlier -- 7 THE WITNESS: Oh, I'm sorry. 8 Q. I think you testified earlier that 9 any e-mails you would have had with Mr. 10 Powers would be on your phone; is that right? 11 A. I would think so, yes. 12 Q. And any WhatsApp messages you would 13 have had with her or Mr. Rubin would have 14 been on your phone, correct? 15 A. Yes. 16 MR. ROSENBERG: Counsel, once 17 again, there are no WhatsApp 18 communications reflecting this and no 19 e-mails reflecting this in your 20 production. Can you explain how that's 21 so? 22 MR. GROSSMAN: This isn't my 23 deposition, counsel. You can continue, 24 or if you want to end it, end it. 25 MR. ROSENBERG: Counsel, there have</p>
Page 131	Page 133
<p>1 [REDACTED]/Lawson 2 A. I don't remember. 3 Q. Referring to the complaint, the 4 second amended complaint, paragraph 445. I 5 believe you have that. 6 Paragraph 445 states, "In late 7 December, Lawson found herself in a tough 8 financial situation. Because Rubin and 9 Powers had kept in touch via WhatsApp, they 10 were aware of this and again convinced Lawson 11 to travel to New York on her own, offering 12 her \$5,000 compensation for her time and 13 assuring her that her safety would not be 14 threatened." 15 Does this refresh your recollection 16 about the circumstances under which you met 17 Mr. Rubin a second time? 18 A. I can't remember. 19 Q. So you can't say whether this is 20 accurate or inaccurate; is that correct? 21 A. I cannot remember. 22 Q. The next paragraph states that 23 "Powers again purchased Lawson's plane 24 tickets and transmitted the flight records to 25 Lawson via e-mail."</p>	<p>1 [REDACTED] Lawson 2 been so many deficiencies in your 3 document production. This will 4 obviously impact the deposition and will 5 require us to keep it open. 6 MR. SCHMIDT: Your position is 7 noted, counsel. 8 Q. Do you recall that you agreed to 9 come and see Mr. Rubin again, in exchange for 10 \$5,000, in December of 2016? 11 A. I did go to see him again. 12 Q. Isn't it a fact, Ms. [REDACTED], that 13 you did not fly to see him from Florida, that 14 you were already in New York when you went to 15 see him the second time? 16 A. I don't, I don't remember. 17 Q. Isn't it correct that you were in 18 New York, and you contacted him to see if you 19 could come and see him again? 20 A. I don't remember. 21 Q. Is it correct that you arranged to 22 meet with Mr. Rubin at the [REDACTED] for lunch 23 and drinks? 24 A. I don't remember. 25 Q. You don't remember that.</p>

Page 134	Page 136
<p>1 [REDACTED] Lawson</p> <p>2 A. The [REDACTED] doesn't sound familiar</p> <p>3 to me for that, so I don't remember.</p> <p>4 Q. When you say it doesn't sound</p> <p>5 familiar to you for that, you see, of course,</p> <p>6 that paragraph 447, it states, "This time</p> <p>7 Rubin requested to meet Lawson at the [REDACTED]</p> <p>8 for lunch and drinks."</p> <p>9 A. I don't remember.</p> <p>10 Q. You don't remember if that</p> <p>11 happened?</p> <p>12 A. I don't remember.</p> <p>13 We did meet for lunch. I don't</p> <p>14 remember where. I don't remember. I don't</p> <p>15 remember.</p> <p>16 Q. And you say that "Lawson's worries</p> <p>17 were initially assuaged due to the time of</p> <p>18 day and because of how kind both Powers and</p> <p>19 Rubin appeared to treat her."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. How were your worries assuaged on</p> <p>23 account of the time of day?</p> <p>24 A. I don't remember.</p> <p>25 Q. Did you ever indicate to anyone</p>	<p>1 [REDACTED] Lawson</p> <p>2 both Powers and Rubin appeared to treat her."</p> <p>3 Can you please describe how Powers</p> <p>4 and Rubin had treated you kindly?</p> <p>5 A. I don't remember.</p> <p>6 Q. You don't remember.</p> <p>7 A. Uh-uh.</p> <p>8 Q. Do you recall anything about your</p> <p>9 lunch with Mr. Rubin on the second occasion</p> <p>10 you met with him?</p> <p>11 A. He was nice.</p> <p>12 Q. Do you remember anything else?</p> <p>13 A. We ordered drinks.</p> <p>14 Q. Do you remember anything else about</p> <p>15 your meeting with him?</p> <p>16 A. Meeting where?</p> <p>17 Q. On this second occasion, your lunch</p> <p>18 with him.</p> <p>19 A. We had drinks.</p> <p>20 Q. And just -- Mr. Rubin had been nice</p> <p>21 at the [REDACTED], too, hadn't he, the</p> <p>22 first time you met him?</p> <p>23 A. The [REDACTED]?</p> <p>24 Q. When you had him at the [REDACTED]</p> <p>25 restaurant or hotel, he had been perfectly</p>
Page 135	Page 137
<p>1 [REDACTED] Lawson</p> <p>2 that you had no worries about seeing Mr.</p> <p>3 Rubin, because of the time of day that he was</p> <p>4 seeing you?</p> <p>5 A. I don't remember what I said.</p> <p>6 Q. And when you say, you also say here</p> <p>7 that your "worries were assuaged because of</p> <p>8 how kind both Powers and Rubin appeared to</p> <p>9 treat her."</p> <p>10 Can you explain what you're</p> <p>11 referring to there?</p> <p>12 A. I don't.</p> <p>13 Q. You don't know what's being</p> <p>14 referred to there?</p> <p>15 A. Say that again?</p> <p>16 Q. What's being referred to in that</p> <p>17 paragraph?</p> <p>18 A. Which paragraph?</p> <p>19 Q. Paragraph 447, which I just read.</p> <p>20 Let me read it again, so we're clear.</p> <p>21 A. Okay.</p> <p>22 Q. "This time, Rubin requested to meet</p> <p>23 Lawson at the [REDACTED] for lunch and drinks.</p> <p>24 Lawson's worries were initially assuaged due</p> <p>25 to the time of day and because of how kind</p>	<p>1 [REDACTED] Lawson</p> <p>2 nice the first time, correct?</p> <p>3 A. The [REDACTED], it was fine.</p> <p>4 Q. Okay.</p> <p>5 A. It was --</p> <p>6 Q. When you came back to, when you met</p> <p>7 with Mr. Rubin, there came a time, then, that</p> <p>8 you went back to the penthouse with him,</p> <p>9 correct?</p> <p>10 A. Which time?</p> <p>11 Q. The second time.</p> <p>12 A. Yeah.</p> <p>13 Q. And you knew at that time that you</p> <p>14 would be paid \$5,000 for your session with</p> <p>15 him, correct?</p> <p>16 A. I was -- I don't remember exactly</p> <p>17 the amount that we said at first.</p> <p>18 Q. You don't remember that it was</p> <p>19 \$5,000?</p> <p>20 A. It could be.</p> <p>21 Q. But you don't remember?</p> <p>22 A. It could be. It was the same as</p> <p>23 before.</p> <p>24 Q. Okay. And when you were on your</p> <p>25 way, when you agreed to meet with Mr. Rubin</p>

35 (Pages 134 to 137)

Page 138	Page 140
<p>1 [REDACTED]/Lawson 2 and to go to the penthouse with him, did you 3 have an expectation of what would happen? 4 A. I don't know. 5 Q. Well, you'd had an occasion with 6 him earlier, correct, that you testified 7 about, correct? 8 A. Right. 9 Q. And did you have a discussion about 10 that with him? 11 A. I don't remember. 12 Q. Did you say, in words or substance, 13 I don't want to do this or I don't want to do 14 that, or let's do this or let's do that? 15 A. I don't remember what I said. 16 Q. Did you understand that you would 17 end up having sex with him on the second 18 occasion? 19 A. No. 20 Q. You didn't understand that? 21 A. No. 22 Q. Did you understand that you would 23 be tied up on the second occasion? 24 A. No. 25 Q. Did he indicate to you that you</p>	<p>1 [REDACTED]/Lawson 2 A. I don't remember. 3 Q. Then what happened? 4 A. Then we went back to the penthouse. 5 Q. Then what happened? 6 MR. ROSENBERG: Withdrawn. 7 Q. Was anyone else present? 8 A. No. 9 Q. What time was it when you went back 10 to the penthouse? 11 A. I don't know. 12 Q. What happened next? 13 A. He mixed drinks for us. 14 Q. And what happened next? 15 A. He pulled out his laptop. 16 Q. And then what happened? He pulled 17 out his laptop, and what did you do? 18 A. Watched him. 19 Q. Do what? 20 A. Pull out his laptop. 21 Q. Okay. What did he do on his 22 laptop? 23 A. Went to an [REDACTED]. 24 Q. And what happened next? 25 A. He played a [REDACTED]</p>
Page 139	Page 141
<p>1 [REDACTED]/Lawson 2 would not be? 3 A. I don't remember what we said, what 4 we discussed. 5 Q. And do you recall what you 6 expected? 7 A. No. I don't recall. 8 Q. Would it be fair to say, Ms. [REDACTED], 9 that you expected much of the same behavior 10 that had happened the first time? 11 A. No. That would not be fair to say. 12 Q. What basis did you have to expect 13 anything different, Ms. [REDACTED]? 14 A. I don't remember why. 15 Q. You don't remember why you had a 16 different expectation? 17 A. I don't remember why. 18 Q. Okay. But you don't remember -- 19 MR. ROSENBERG: Well, withdrawn. 20 Q. Can you describe, please, your 21 encounter with Mr. Rubin in December of 2016? 22 A. We met for lunch. 23 Q. What happened next? 24 A. We ordered drinks. 25 Q. How many drinks did you have?</p>	<p>1 [REDACTED] Lawson 2 [REDACTED], that I recall. 3 Q. And did you watch the [REDACTED] 4 [REDACTED] with him? 5 A. I had seen some of it, yes. 6 Q. Was it anyone you knew in it, or 7 was it you in it, or it was not you? 8 A. I don't do [REDACTED]. 9 Q. And was it anybody you knew in it? 10 A. No. 11 Q. And how long did you and he watch 12 the [REDACTED]? 13 A. I don't remember how long he had it 14 on for. 15 Q. And after you, when were watching 16 it, what happened after you watched it? 17 A. I was dragged into the red room. 18 Q. You were dragged in, how? 19 A. Dragged into the red room, pulled 20 into the red room. 21 Q. How were you pulled in, by your 22 hair, by your arm, do you remember? 23 A. I don't remember exactly how. 24 Q. And you went into the red room, and 25 what did you do there?</p>

Page 142	Page 144
<p>1 [REDACTED]/Lawson 2 A. I was [REDACTED] 3 [REDACTED]. 4 Q. And at this point did you say -- 5 what did you say? 6 A. I don't remember what exactly I 7 said. 8 Q. Tell me anything you recall. 9 A. I don't recall what I said. 10 Q. Okay. And what happened next? 11 A. I was really out of it and I was 12 hit. I don't know what I was doing. 13 Q. Did there come a time that Mr. 14 Rubin had used a [REDACTED] 15 that caused, that -- with you? 16 A. Yes. 17 Q. Okay. And describe what that was. 18 A. It was [REDACTED]. 19 Q. And how did you know it was a 20 [REDACTED]? 21 A. I don't know. I just knew. 22 Q. You don't know, you just knew. 23 A. I don't know. It was a [REDACTED] 24 [REDACTED]. 25 Q. Well, let me refer you, Ms. [REDACTED],</p>	<p>1 [REDACTED]/Lawson 2 We'll come back to that. 3 And describe, please, what 4 happened, when Mr. Rubin used this device on 5 you and what happened for the rest of the 6 encounter between you and him. 7 A. What happened next? 8 Q. Yes. 9 A. Can you repeat the one before? 10 Q. Well, after he came at you with 11 what you contend was a [REDACTED] of the 12 kind you had seen in [REDACTED], what 13 happened next? 14 A. It was used on my [REDACTED]. 15 Q. Okay. And it was [REDACTED] 16 [REDACTED], as alleged in the complaint? 17 A. Yes. 18 Q. By the way, you said you'd seen it 19 in fetish conventions before, this device or 20 similar devices. Had you ever used it in any 21 of your fetish work? 22 A. Fuck, no. 23 I'm sorry. I've got to stop for a 24 second. 25 THE WITNESS: I need a break.</p>
Page 143	Page 145
<p>1 [REDACTED]/Lawson 2 to paragraph 450 of your complaint. 3 Are you on paragraph 450? 4 A. No, I'm not. 5 Q. Please turn there. 6 And it says, "Rubin then came 7 towards Lawson with a large instrument, 8 causing Lawson to fear imminent harm. Lawson 9 was at first not certain what the device was, 10 but quickly realized that Rubin was holding 11 what appeared to be a cattle prod, which 12 Lawson knew was supposed to be used to shock 13 livestock." 14 My question is, how did you know 15 what this instrument, how did you come to the 16 belief that this instrument was supposed to 17 be used to [REDACTED]? 18 A. Because I've seen them before. 19 Q. Where had you seen them? 20 A. [REDACTED] 21 [REDACTED]. 22 Q. So you had seen these in the fetish 23 industry, you were familiar with them? 24 A. Conventions. 25 Q. I see.</p>	<p>1 [REDACTED]/Lawson 2 THE VIDEOGRAPHER: We're going off 3 the record at 1:48 p.m. This completes 4 disk 2 of the videotape deposition of 5 Hillary Lawson. 6 (Lunch recess taken at 1:48 p.m.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

Page 166	Page 168
<p>1 [REDACTED]/Lawson 2 Do you recall whether your 3 encounter with him was in the early 4 afternoon, middle afternoon or the evening? 5 A. That statement you just said was 6 false. I'm not going to answer that 7 question. I read what you had on that paper. 8 I never said that, so. 9 Q. Okay. 10 A. I don't remember what I had said, 11 and I told you that. 12 Q. Leaving that aside, do you remember 13 approximately in the morning, afternoon, 14 evening, when you were in the penthouse with 15 Mr. Rubin on this second occasion? 16 A. I do not remember. 17 Q. Tell me everything you remember 18 after Mr. Rubin inserted the cattle prod in 19 your vagina. 20 A. I was crying. I remember crying. 21 I remember where my legs were hurting really 22 bad, my arming were hanging. 23 Q. Do you remember anything else? 24 A. After that? 25 Q. Yes.</p>	<p>1 [REDACTED]/Lawson 2 page 62 and the top of page 63 to yourself, 3 and ask if that refreshes your recollection. 4 I want to get the fullest recollection 5 possible. 6 A. 62? 7 Q. Page 62, yes. Paragraph 449 8 through to paragraph 458. 9 Ma'am, my question to you is, 10 again, does that refresh your recollection as 11 to anything that happened that day? 12 A. It's really hard to talk about. 13 Unfortunately, some of it, I don't 14 know. 15 Q. Ma'am, please tell me what you 16 recall now. 17 A. Just being hit. 18 Q. I'm sorry, just being -- 19 A. The beating in general. 20 Q. Do you remember anything else, any 21 of the specifics mentioned in this complaint? 22 A. I don't remember right now. I 23 don't remember right now. 24 Q. So you cannot tell me whether any 25 of the allegations, or which of the</p>
Page 167	Page 169
<p>1 [REDACTED]/Lawson 2 A. I was being called names. The word 3 I hate the most, over and over. 4 Q. What word was that? 5 A. Cunt whore. 6 Q. Do you remember anything else? 7 A. It's all just a blur. Just it hurt 8 so fucking -- it hurt so bad. I'm sorry, 9 it's hard to remember everything. 10 Q. Is there anything you could look at 11 or refer to that would help you recall better 12 what happened that day? 13 A. Are you kidding me right now, 14 really? What kind of question is that? 15 No, no, I don't remember. I don't 16 want -- no. 17 THE WITNESS: Can I have a tissue, 18 please. 19 Q. Did you ever -- 20 MR. ROSENBERG: Well, withdrawn. 21 Q. Let's take a look at the second 22 amended complaint. 23 MR. ROSENBERG: If you could please 24 put it before the witness. 25 Q. I would ask you, please, to read</p>	<p>1 [REDACTED]/Lawson 2 allegations in paragraphs 449 through 457 -- 3 A. Yes, they're all true. 4 Q. And you just told me -- so you do 5 remember them or you don't remember them? 6 A. I don't want to remember this. I 7 don't want to think about this. This is 8 torture. 9 Q. Ma'am, you brought this lawsuit, 10 and I'm asking you. Ma'am, you brought this 11 lawsuit and I must ask, what do you remember 12 and what don't you remember. 13 What do you remember of that 14 encounter? 15 A. Which one? Pick one. 16 Q. No, ma'am, please tell me, what do 17 you remember in your own words of that 18 encounter? 19 A. I was [REDACTED]. I was [REDACTED] and I was 20 [REDACTED]. I had a cattle prod used on my, inside 21 of my vagina. I would pay someone \$5,000 not 22 to do that to my vagina, okay? Do you know 23 what that feels like? 24 I've got to take a break. Go ahead 25 ask what you want to ask, but I need a break.</p>

Page 186

1 [REDACTED] /Lawson
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

Page 187

1 [REDACTED] e/Lawson
2 capsulated.
3 Q. Did you go to a doctor for the
4 capsulated left breast?
5 A. I did not.
6 Q. How did you know that your left
7 breast is capsulated?
8 A. I was getting a facial, and the
9 girl that does my facials used to work for a
10 plastic surgeon, and she noticed that there
11 was -- she noticed some things and asked me
12 some questions and told me that that's what
13 it was.
14 Q. I see, okay. And when was that?
15 A. She used to work for a plastic
16 surgeon.
17 I don't know exactly when.
18 Q. Approximately when was that?
19 A. But I started noticing things, and
20 she noticed it.
21 Q. How long after your encounter with
22 Mr. Rubin did you have this facial?
23 A. I don't know. I don't want to
24 speculate. I don't know.
25 Q. And did you, have you treated the

Page 188

1 [REDACTED] Lawson
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

Page 189

1 [REDACTED] /Lawson
2 Q. Were there jobs you lost?
3 A. Mentally, it's had a really hard
4 toll on me for that. I'm not as confident as
5 I used to be, and like I just --
6 Q. After the woman giving you the
7 facial told you you had a capsulated left
8 breast, did you go to see a doctor?
9 A. No. I already felt something was
10 wrong.
11 Q. Did you go to see a doctor for any
12 harm to your vagina or vaginal area?
13 A. No.
14 Q. Did you go to see a doctor for the
15 bruise under your right eye?
16 A. No.
17 Q. Do you have any photographs of the
18 bruise under your right eye?
19 A. I had filler, I get filler under my
20 eye and when I was hit, it caused like an
21 indentation, obviously, so. I don't need to
22 go to a doctor, I can see it.
23 Q. And did the bruise heal under your
24 right eye?
25 A. Yes.

<p>Page 194</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 196</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p>Page 195</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 197</p> <p>1 [REDACTED]/Lawson</p> <p>2 Q. Do you recall any photo sheets you</p> <p>3 did in January 2017?</p> <p>4 A. No.</p> <p>5 Q. Do you recall that on or about</p> <p>6 January 16th, 2017 you took a trip to, for a</p> <p>7 week, to [REDACTED]?</p> <p>8 A. What days?</p> <p>9 Q. On or about January 16, 2017, you</p> <p>10 took a trip to [REDACTED].</p> <p>11 A. I don't know the dates that I went</p> <p>12 there, but we did go to [REDACTED].</p> <p>13 Q. And when you said "we," it was you</p> <p>14 and Mr. [REDACTED]?</p> <p>15 A. And others.</p> <p>16 Q. And others?</p> <p>17 A. Yes.</p> <p>18 Q. So is it fair to say that if you</p> <p>19 went in January, you were not injured, and</p> <p>20 that didn't incapacitate you in any way in</p> <p>21 going on a trip, correct?</p> <p>22 A. I don't -- I don't know.</p> <p>23 Q. You don't know?</p> <p>24 How were you incapacitated?</p> <p>25 A. I didn't say I was incapacitated.</p>

50 (Pages 194 to 197)

<p>Page 198</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 200</p> <p>1 [REDACTED] Lawson</p> <p>2 A. I had issues sleeping.</p> <p>3 Q. Anything else?</p> <p>4 A. [REDACTED]. I was diagnosed with</p> <p>5 [REDACTED].</p> <p>6 Q. You were diagnosed with [REDACTED]?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Okay. Anything else?</p> <p>9 A. That's what I can remember at the</p> <p>10 moment. That's --</p> <p>11 Q. That's it. Okay.</p> <p>12 Who diagnosed you with [REDACTED]?</p> <p>13 A. Dr. [REDACTED].</p> <p>14 Q. And when did you see Dr. [REDACTED]?</p> <p>15 A. I don't remember the date.</p> <p>16 Q. When did he diagnose you with [REDACTED]?</p> <p>17 A. It was [REDACTED]. I</p> <p>18 don't remember the date.</p> <p>19 Q. Isn't it a fact that you did not --</p> <p>20 (Discussion off the record.)</p> <p>21 Q. Isn't it correct that you first saw</p> <p>22 Dr. [REDACTED] in June of 2017?</p> <p>23 A. I don't know. I don't know when I</p> <p>24 saw him.</p> <p>25 Q. Is it correct that you have had</p>
<p>Page 199</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 201</p> <p>1 [REDACTED]/Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

51 (Pages 198 to 201)

<p>Page 338</p> <p>1 [REDACTED] Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>Page 340</p> <p>1 [REDACTED] Lawson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p>Page 339</p> <p>1 [REDACTED] Lawson</p> <p>2 communications with Ms. Powers in that time</p> <p>3 period?</p> <p>4 A. I don't remember any</p> <p>5 communications.</p> <p>6 Q. Now, do you remember Ms. Powers</p> <p>7 sending you money via PayPal?</p> <p>8 A. I don't remember her sending me</p> <p>9 money via PayPal, but I know that she did.</p> <p>10 Q. And the money she sent you was</p> <p>11 \$5,000, right?</p> <p>12 A. Correct.</p> <p>13 Q. And you understand that this was</p> <p>14 Mr. Rubin's money that she was sending on his</p> <p>15 behalf, correct?</p> <p>16 MR. GROSSMAN: Objection, calls for</p> <p>17 speculation.</p> <p>18 But answer, if you can.</p> <p>19 A. I don't know. It came from her</p> <p>20 PayPal.</p> <p>21 Q. But you knew it was Mr. Rubin's</p> <p>22 money and that she was doing it on his</p> <p>23 behalf, at his instruction, correct?</p> <p>24 MR. GROSSMAN: Same objection, same</p> <p>25 instruction.</p>	<p>Page 341</p> <p>1 [REDACTED] awson</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

86 (Pages 338 to 341)